

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

ELISEO ESCAMILLA, )  
Plaintiff, )  
v. ) No. 08 CV 2608  
EMERALD CONCRETE, INC., )  
MARTIN KEANE, Individually, and ) Judge John W. Darrah  
JERRY KEANE, Individually, ) Magistrate Judge Schenkier  
Defendants. )

**AGREED MOTION TO EXTEND TIME TO ANSWER  
OR OTHERWISE PLEAD**

Defendants, Emerald Concrete, Inc., Martin Keane, Individually, and Jerry Keane, Individually, by their attorneys, Klein Dub & Holleb, Ltd., herein move this Court for an order extending the time for Defendants to answer or otherwise respond to the Complaint from July 21, 2008 to August 21, 2008. The parties have seriously discussed settlement, and have reached an agreement in principal and are working out the final details for settling the case without further litigation.

Counsel for Defendants has conferred by telephone with counsel for Plaintiff, Marty Denis on July 17, 2008, regarding this Motion and both parties concur in the relief requested.

WHEREFORE, Defendants request that their motion be granted and that the Court enter an order extending the time for Defendants to answer or otherwise respond to the Complaint to August 21, 2008.

Dated: July 17, 2008

Respectfully submitted,

EMERALD CONCRETE, INC., MARTIN KEANE, Individually, and JERRY KEANE, Individually

By: s/Davi L. Hirsch  
DAVI L. HIRSCH (ARDC #6182757)  
KLEIN DUB & HOLLEB, LTD.  
660 LaSalle Place, Suite 100  
Highland Park, Illinois 60035  
(847) 681-9100  
[dhirsch@labor-law.com](mailto:dhirsch@labor-law.com)